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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Steven M. Shepard (admitted *pro hac vice*)
Alexander Frawley (admitted *pro hac vice*)
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Case No.: 5:20-cv-03664-LHK-SVK

**DECLARATION OF ALEXANDER P.
FRAWLEY IN SUPPORT OF
ADMINISTRATIVE MOTION TO SEAL
PLAINTIFFS' NOVEMBER 4 HEARING
DEMONSTRATIVES**

The Honorable Susan van Keulen
Date: November 4, 2021
Time: 10:00 a.m.
Courtroom 6 - 4th Floor

DECLARATION OF ALEXANDER P. FRAWLEY

I, Alexander P. Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 97). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5(e), I submit this Declaration in Support of Plaintiffs' Administrative Motion to Seal the Demonstratives that Plaintiffs presented during the November 4, 2021 hearing regarding the parties' Objections to the Special Master's Report and Orders on Referred Discovery Disputes (Dkt. 299). Plaintiffs respectfully request that the Court seal the Demonstratives, which are attached to Plaintiffs' Administrative Motion to Seal.

3. Pursuant to Civil Local Rule 79-5(e)(1), Google, as the designating party, must file a declaration within 4 days establishing that all of the designated material is sealable.

4. I personally served a copy of this Declaration on Google's counsel of record by email on November 4, 2021. A Proof of Service is concurrently filed herewith.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 4th day of November, 2021, at New York, New York.

/s/ Alexander P. Frawley